

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

HANS A. QUAACK, ATTILIO PO  
and KARL LEIBINGER, on behalf of  
themselves and those similarly situated,

Plaintiffs,

v.

DEXIA BANK BELGIUM  
(formerly known as ARTESIA BANKING  
CORP., SA),

Defendants.

Civil Action No.: 03-11566 (PBS)

STONINGTON PARTNERS, INC., a Delaware  
Corporation, STONINGTON CAPITAL  
APPRECIATION 1994 FUND L.P., a Delaware  
Partnership and STONINGTON HOLDINGS,  
L.L.C., a Delaware limited liability company,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM  
(formerly known as ARTESIA BANKING  
CORP., SA),

Defendants.

Civil Action No.: 04-10411 (PBS)

GARY B. FILLER and LAWRENCE  
PERLMAN, Trustees of the TRA Rights Trust,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM  
(formerly known as ARTESIA BANKING  
CORP., SA),

Defendants.

Civil Action No.: 04-10477 (PBS)

JANET BAKER and JAMES BAKER,  
JKBAKER LLC and JMBAKER LLC,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM  
(formerly known as ARTESIA BANKING  
CORP., SA),

Defendants.

Civil Action No.: 04-10501 (PBS)

**DEXIA BANK BELGIUM'S MOTION FOR A PROTECTIVE ORDER PREVENTING  
THE DEPOSITIONS OF AXEL MILLER AND STEFAAN DECRAENE**

Defendant Dexia Bank Belgium, by and through its counsel, hereby moves to prevent the depositions of Axel Miller and Stefaan Decraene.

In support of this motion, Dexia Bank Belgium submits the accompanying Memorandum of Law and the Declaration of Jeff E. Butler.

WHEREFORE, Dexia Bank Belgium requests that this motion to prevent the depositions of Axel Miller and Stefaan Decraene be granted in full.

**REQUEST FOR ORAL ARGUMENT**

In accordance with Local Rule 7.1(D), Dexia Bank Belgium requests oral argument on this motion.

### **CERTIFICATION**

The undersigned counsel hereby certifies, pursuant to Local Rule 7.1(A)(2), that counsel for Dexia Bank Belgium and counsel for all Plaintiffs conferred in good faith regarding the depositions of Mssrs. Miller and Decraene, and were unable to reach agreement.

Dated: June 1, 2006

Respectfully submitted,

MINTZ LEVIN COHN FERRIS GLOVSKY &  
POPEO

By: /s/ Breton Leone-Quick  
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*Counsel for Dexia Bank Belgium*

### **Certificate of Service**

I, Breton Leone-Quick, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on June 1, 2006.

/s/ Breton Leone-Quick

Dated: June 1, 2006